

# EXHIBIT “B”

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**BLUE CROSS AND BLUE SHIELD  
OF ALABAMA; MUNICIPAL  
WORKERS COMPENSATION  
FUND, INC.,**

**Plaintiffs**

**v.**

**PFIZER, INC., WARNER-  
LAMBERT COMPANY LLC;  
WARNER-LAMBERT COMPANY;  
PARKE-DAVIS, A DIVISION OF  
WARNER-LAMBERT COMPANY  
AND WARNER-LAMBERT  
COMPANY LLC; DAVID  
LONGMIRE,**

**Defendants**

**CIVIL ACTION NO.  
2:06-cv-00524-MEF-VPM**

**DECLARATION OF DAVID R. LONGMIRE, M.D.**

1. My name is David R. Longmire. I am over twenty-one years of age, am of sound mind, and am competent to make this declaration. This declaration is based upon my personal knowledge.

2. I am a physician licensed to practice medicine in the State of Alabama, specializing in pain evaluation and management, neurological assessment, and clinical neurophysiology. I am a Clinical Associate Professor in the Department of Internal Medicine at the University of Alabama Birmingham-Huntsville Regional Medical Campus in Huntsville, Alabama.

3. Since 1969, I have had a special interest in the area of clinical

and neuro-physiological assessment of various forms of neuropathic pain.

4. From 1991-1994, I published a number of articles relating to the neurological aspects of pain and the diagnostic evaluation of various forms of neuropathic pain disorders.

5. I began prescribing Neurontin in approximately early 1994 for its indicated uses, as adjunctive therapy for treatment of seizures in epilepsy patients.

6. I began examining Neurontin's efficacy for treating pain-related conditions before I had any dealings regarding Neurontin with either Parke-Davis or Warner-Lambert.

7. To my knowledge, the research and consulting services I provided to Parke-Davis and Warner-Lambert were lawful and proper.

8. During 1996 and 1997, and twice in 1998, independent medical education companies invited me to speak at various continuing medical education ("CME") meetings of physicians regarding my observations on Neurontin in epilepsy as well as its effect on comorbid or neuropathic pain.

9. I have never misrepresented any fact regarding Neurontin, including in connection with any CME seminars or any other speaking events.

10. I have never spoken with Blue Cross and Blue Shield of Alabama ("BCBS") about Neurontin or the off-label use of Neurontin.

11. I had never heard of Municipal Workers Compensation Fund, Inc. ("MWCF") before that company sued me in this matter.

12. I have never spoken with MWCF about Neurontin or the off-label use of Neurontin.

13. I have never made any representations of any kind to BCBS or its agents about Neurontin or the off-label use of Neurontin.

14. I have never made any representations of any kind to MWCF or its agents about Neurontin or the off-label use of Neurontin.

15. I have never promoted Neurontin or the off-label use of Neurontin to BCBS.

16. I have never promoted Neurontin or the off-label use of Neurontin to MWCF.

17. To the best of my knowledge, neither BCBS nor any agent of BCBS ever attended any presentation or speech that I gave at any location regarding Neurontin or the off-label use of Neurontin.

18. To the best of my knowledge, neither MWCF nor any agent of MWCF ever attended any presentation or speech that I gave at any location regarding Neurontin or the off-label use of Neurontin.

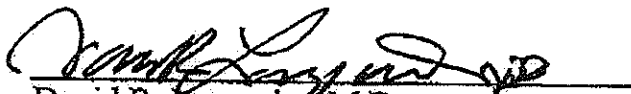
19. All statements I made about Neurontin at any CME Conference or any other speaking engagement were truthful and were intended for the audience to which I was speaking. I never intended for any statements I made at such speaking engagements or at any other time to influence the coverage decisions of any third-party payors for prescription medications, including BCBS and MWCF.

20. I never agreed to assist Warner-Lambert or any other corporate entity or individual in any alleged illegal off-label promotion of Neurontin and have no personal knowledge of any illegal off-label promotion of Neurontin by Warner-Lambert or any other corporate entity or individual.

21. I have not performed any services for Parke-Davis or Warner-Lambert since 1998-1999.

Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 22, 2006.

  
David R. Longmire, M.D.